

FILED

OCT 28 2022

Clerk, U. S. District Court
Eastern District of Tennessee
At Knoxville

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT _____

Khari R. McBride

(Enter above the NAME of the plaintiff in this action.)

v.

Mercedes Benz

of

Knoxville

(Enter above the NAME of each defendant in this action.)

3:22 cv 381

McDonough / McCook

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(42 U.S.C. Section 1983)

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? YES () NO (✓)

B. If your answer to A is YES, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to the previous lawsuit:

Plaintiffs: _____

Defendants: _____

2. COURT: (If federal court, name the district; if state court, name the county):

3. DOCKET NUMBER: _____
4. Name of Judge to whom case was assigned: _____
5. Disposition: (For example: Was the case dismissed? Was it appealed? Is it still pending?) _____
6. Approximate date of filing lawsuit: _____
7. Approximate date of disposition: _____

II. PLACE OF PRESENT CONFINEMENT: _____

- A. Is there a prisoner grievance procedure in this institution? YES () NO (✓)
- B. Did you present the facts relating to your complaint in the prisoner grievance procedure? YES () NO ()
- C. If your answer is YES,
 1. What steps did you take? _____

 2. What was the result? _____

- D. If your answer to B is NO, explain why not. _____

- E. If there is no prison grievance procedure in the institution, did you complain to the prison authorities? YES () NO ()
- F. If your answer is YES,
 1. What steps did you take? _____

2. What was the result? _____

III. PARTIES

(In item A below, please your name in the first blank and place your present address in the second blank. Do the same for any additional plaintiffs.)

A. Name of plaintiff: Khari R. McBride
Present address: 1427 Kenesaw Ave Knoxville, TN 37919 Apt. I
Permanent home address: 1427 Kenesaw Ave Knoxville, TN 37919 Apt. I
Address of nearest relative: 1290 Kendall Town Blvd Jax, FL 32225

(In item B below, place the FULL NAME of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the additional names, positions, and places of employment of any additional defendants.)

B. Defendant: Mercedes Benz of Knoxville
Official position: Management team
Place of employment: Mercedes Benz of Knoxville
C. Additional defendants: Tom Kajitani, Darrell Littrell, Mendee Hopper

IV. STATEMENT OF CLAIM

(State here as briefly as possible the FACTS of your case. Describe how EACH defendant is involved. Include also the names of other persons involved, dates and places. DO NOT give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets, if necessary.)

1. On 7/29/2021 at Mercedes Benz of Knoxville,

Darrell Littrell asked me if I needed a "hot shower and long talk" with Eli, a former coworker and then sent me home. He slammed my locker doors and the doors to the car I was working on very aggressively and proceeded to invade my personal space.

2. On 7/30/2021 at Mercedes Benz of Knoxville, Mendee Hopper was notified of events from the previous day. She verbally acknowledged the events but failed to properly document and take corrective action towards Darrell Littrell.

3. On 11/4/2021 at Mercedes Benz of Knoxville, Tom Kajitani and Darrell Littrell placed me on a 4-day suspension due to a tardiness that I notified Tom about. Multiple of my former coworkers were consistently late, without giving notice, and did not receive any disciplinary actions. or to the same extent

4. On 12/6/2021 at Mercedes Benz of Knoxville, Darrell Littrell singled me out by calling "Special" followed by an inappropriate hand gesture making an implication of mentally handicapped.

V. RELIEF

(State BRIEFLY exactly what you want this Court to do for you. Make NO legal arguments.

Cite NO cases or statutes.)

I believe proper relief from the events that took place includes, but is not limited to, compensation for pain and suffering; court costs; and punitive damages.

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this 28th day of Oct., 2022.

Karen M. Birn
Signature of plaintiff(s)

5. On 2/11/2022 at Mercedes Benz of Knoxville, Tom Kajitani, Darrell Littrell, and Mendee Hopper jointly decided to terminate me for supposedly damaging a van by parking it too close to a tree. NO damage to said van was ever reported and the area is camera accessible.

- The facts and events stated above support my case of discrimination, harrassment, and retaliation from Mercedes Benz of Knoxville and mentioned defendants.